

# EXHIBIT A

**Saad, Lindsey M.**

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**From:** Saad, Lindsey M.  
**Sent:** Thursday, July 27, 2017 2:08 PM  
**To:** 'David Sims'  
**Subject:** RE: Harris v. Q&A

David,

I still have not received your discovery responses in this matter or any communication about when they might be forthcoming. Please allow this email to serve as a good faith effort to resolve this dispute. If I do not receive this discovery by August 1, I will have no choice but to file a Motion to Compel.

**Lindsey M. Saad**

**Flaherty**

FLAHERTY SENSABAUGH BONASSO PLLC

PHONE: 304.225.3052

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**From:** David Sims [<mailto:david.sims@mywvlawyer.com>]  
**Sent:** Monday, July 03, 2017 1:09 PM  
**To:** Saad, Lindsey M.  
**Subject:** Re: Harris v. Q&A

I can by the 14<sup>th</sup>. The holidays and other things scheduled will permit me to get them done by that date.

On Jul 3, 2017, at 12:53 PM, Saad, Lindsey M. <[LSaad@flahertylegal.com](mailto:LSaad@flahertylegal.com)> wrote:

Hi David,

I hope this email finds you well. Can you please have the plaintiff's discovery responses to me in the next week? Thank you.

Hope you have a happy Fourth,

**Lindsey M. Saad**

**Flaherty**

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PHONE: 304.225.3052

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**From:** David Sims [<mailto:david.sims@mywvlawyer.com>]  
**Sent:** Thursday, June 08, 2017 4:03 PM  
**To:** Saad, Lindsey M.  
**Subject:** RE: Harris v. Q&A

Hi Lindsey.

Very shortly.

I have them done. I just need to review. I have been preparing for a trial that just got continued today, so I am going to have some unexpected free time.

David

**From:** Saad, Lindsey M. [mailto:[LSaad@flahertylegal.com](mailto:LSaad@flahertylegal.com)]  
**Sent:** Thursday, June 8, 2017 3:54 PM  
**To:** David Sims <[david.sims@mywvlawyer.com](mailto:david.sims@mywvlawyer.com)>  
**Subject:** RE: Harris v. Q&A

Hi David,

I wanted to touch base about this discovery. Do you have a time frame of when we can expect to receive the responses?

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**Lindsey M. Saad**

**Flaherty**

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PHONE: 304.225.3052

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**From:** David Sims [mailto:[david.sims@mywvlawyer.com](mailto:david.sims@mywvlawyer.com)]  
**Sent:** Thursday, April 13, 2017 10:34 AM  
**To:** Saad, Lindsey M.  
**Cc:** Jones, Christopher M  
**Subject:** RE: Harris v. Q&A

Thank you for following up. I appreciate it. I have them nearly completed, but I have about 1500 pages of information to review that I am sending that are new documents you don't already have.

**From:** Saad, Lindsey M. [mailto:[LSaad@flahertylegal.com](mailto:LSaad@flahertylegal.com)]  
**Sent:** Thursday, April 13, 2017 10:32 AM  
**To:** David Sims <[david.sims@mywvlawyer.com](mailto:david.sims@mywvlawyer.com)>  
**Cc:** Jones, Christopher M <[CJones@flahertylegal.com](mailto:CJones@flahertylegal.com)>  
**Subject:** Harris v. Q&A

David,

I'm sorry that I missed your call yesterday, but I understand that you spoke with Chris. As he stated, take as long as you need to get the discovery responses to us. Thank you.

**Lindsey M. Saad**  
Attorney

# Flaherty

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**Saad, Lindsey M.**

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**From:** Saad, Lindsey M.  
**Sent:** Tuesday, August 22, 2017 2:44 PM  
**To:** 'David Sims'  
**Subject:** RE: Harris v. Q&A

Hi David,

I sincerely hope your treatment is going well and that you are getting better.

Thank you for looking into the missing discovery.

**Lindsey M. Saad**

**Flaherty**

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PHONE: 304.225.3052

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**From:** David Sims [<mailto:david.sims@mywvlawyer.com>]  
**Sent:** Tuesday, August 22, 2017 10:36 AM  
**To:** Saad, Lindsey M.  
**Subject:** RE: Harris v. Q&A

Hi Lindsey. I was in Morgantown all day yesterday at the Cancer Treatment Center for infusion therapy. I had to go to the hospital this morning for lab work from the treatment yesterday. I am at the office now. I will hunt down your box. If I don't get a lead on it today, I will put the records on a disc and overnight them to you.

David

**From:** Saad, Lindsey M. [<mailto:LSaad@flahertylegal.com>]  
**Sent:** Monday, August 21, 2017 4:15 PM  
**To:** David Sims <[david.sims@mywvlawyer.com](mailto:david.sims@mywvlawyer.com)>  
**Subject:** RE: Harris v. Q&A

David,

Still no discovery. Please provide information as to when and how it was sent. I believe you said you mailed it more than 10 days ago.

**Lindsey M. Saad**

**Flaherty**

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PHONE: 304.225.3052

**From:** David Sims [<mailto:david.sims@mywvlawyer.com>]  
**Sent:** Friday, August 18, 2017 10:09 AM  
**To:** Saad, Lindsey M.  
**Subject:** Re: Harris v. Q&A

Thanks for letting me know.

David A. Sims  
Law Offices of David A. Sims, PLLC  
304-428-5291

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**From:** David Sims  
**Sent:** Friday, August 18, 2017 10:07:52 AM  
**To:** Saad, Lindsey M.  
**Subject:** Re: Harris v. Q&A

I will check when I return to the office. I am in court in KY today.

David A. Sims  
Law Offices of David A. Sims, PLLC  
304-428-5291

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**From:** Saad, Lindsey M. <[LSaad@flahertylegal.com](mailto:LSaad@flahertylegal.com)>  
**Sent:** Friday, August 18, 2017 10:04:37 AM  
**To:** David Sims  
**Subject:** Harris v. Q&A

Hi David,

The discovery from Harris v. Q&A still has not arrived. Do you have tracking information for the package?

**Lindsey M. Saad**  
Member

## Flaherty

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